

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

All Cases

MDL 2804

Hon. Dan Aaron Polster

Mag Judge David A. Ruiz

PLAINTIFF CITY OF CLEVELAND'S
MOTION TO DISQUALIFY CAROLE RENDON

Plaintiff City of Cleveland respectfully moves this Court for the following relief and all other relief the Court deems necessary:

1. Carole S. Rendon, counsel in this action for defendants Endo Health Solutions Inc. and Endo Pharmaceuticals, Inc. and the Manufacturer Defendants' Co-Liaison Counsel, shall be disqualified from continuing to represent defendants Endo Health Solutions Inc. and Endo Pharmaceuticals, Inc. and serving as the Manufacturer Defendants' Co-Liaison Counsel. Her law firm, BakerHostetler, shall also be disqualified from the case.
2. In the alternative, Ms. Rendon shall be ordered to sit for a deposition so that Cleveland can discover the full scope of her knowledge about the opioid crisis and Cleveland law enforcement's responses to the crisis, and shall be ordered to cease direct involvement in depositions of witnesses she interacted with as a result of her position as the United States Attorney for the Northern District of Ohio.

This motion is supported by the Attached Memorandum of Points and Authorities in Support of Cleveland's Motion to Disqualify Carole Rendon and accompanying declarations and exhibits in support thereof.

Respectfully submitted,

s/Mark Pifko

Mark Pifko

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Counsel for Plaintiff the City of Cleveland

CERTIFICATE OF SERVICE

I hereby certify that on January 10, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon defense counsel via email.

s/Mark Pifko

Mark Pifko

Counsel for Plaintiff the City of Cleveland

CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

s/Mark Pifko

Mark Pifko

Counsel for Plaintiff the City of Cleveland